

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

20cr155

**UNITED STATES OF AMERICA : CRIMINAL NO.**

**v. : DATE FILED**

**Filed Under Seal**  
4/14/20

**MARCIA LYNN SANTIAGO : VIOLATIONS:**  
: 18 U.S.C. § 1349 (conspiracy to commit mail  
: and wire fraud - 1 count)  
: 18 U.S.C. § 1029(b)(2) (conspiracy to commit  
: access device fraud – 1 count)  
: 18 U.S.C. § 1344 (bank fraud – 1 count)  
: 18 U.S.C. § 1028A(a)(1) (aggravated  
identity theft – 3 counts)  
: 18 U.S.C. § 2 (aiding and abetting)  
Notice of forfeiture

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

Beginning in or sometime prior to May 2018 and continuing until in or about October 2018, in the Eastern District of Pennsylvania and elsewhere, defendant

**MARCIA LYNN SANTIAGO**

conspired and agreed, with others known and unknown, to commit offenses against the United States, that is, to devise a scheme to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing this scheme cause the transmission of wire and mail communications in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1341 and 1343.

**MANNER AND MEANS**

It was part of the conspiracy that:

1. One or more co-conspirators acquired stolen personally identifiable information and other means of identification, including names, credit card information, dates of birth, social security numbers, addresses, and credit histories, of persons (hereinafter the “Victims”) located in the Eastern District of Pennsylvania and elsewhere.

2. One or more co-conspirators used the stolen personally identifiable information and other means of identification of the Victims to apply for personal loans in the names of the Victims, without the Victims’ knowledge and consent, by submitting loan applications to Lender 1, a company then engaged in the business of providing personal installment loans, through on-line submissions via the internet from the Eastern District of Pennsylvania to Lender 1 in the Southern District of Indiana.

3. One or more co-conspirators created false drivers’ licenses in the names of the Victims but containing the photographs of defendant MARCIA LYNN SANTIAGO and other co-conspirators, as well as false paystubs and other false documents in the names of the Victims that purported to represent proof of income and identity.

4. One or more co-conspirators provided defendant MARCIA LYNN SANTIAGO and other co-conspirators with the false drivers’ licenses and false proof of income and identity in the names of the Victims.

5. One or more co-conspirators drove defendant MARCIA LYNN SANTIAGO and other co-conspirators to bank branch offices and instructed defendant SANTIAGO and other co-conspirators to use the means of identification of the Victims to determine if the Victims had accounts at the banks, and if so, to obtain copies of their bank statements.

6. Defendant MARCIA LYNN SANTIAGO entered bank branches and posed as various Victims using the false drivers' licenses and false proof of income and identity in order to determine whether the Victims had any accounts at the banks in question and if so, to obtain copies of their bank statements.

7. One or more co-conspirators drove defendant MARCIA LYNN SANTIAGO and other co-conspirators to Lender 1 branch offices.

8. Defendant MARCIA LYNN SANTIAGO and other co-conspirators entered Lender 1 branch offices and posed as various Victims using the false drivers' licenses and false proof of income in order to obtain the personal loans that had been previously applied for in the names of the Victims.

9. Defendant MARCIA LYNN SANTIAGO and other co-conspirators attempted to obtain checks from Lender 1 made payable to Victims.

10. Defendant MARCIA LYNN SANTIAGO and other co-conspirators used the false drivers' licenses and other means of identification of the Victims to apply for new instant credit in the Victims' names and to access existing credit accounts in the Victims' names, at various merchants, including Raymour and Flanigan, Nordstrom Rack, Gap, Lowes, The Home Depot, Sears, and Best Buy, so that defendant SANTIAGO and other co-conspirators could purchase merchandise and services from the merchants that would be charged to the credit accounts of the Victims.

11. Defendant MARCIA LYNN SANTIAGO and other co-conspirators caused the merchants to transmit instant credit applications in interstate commerce via the internet to the lenders servicing the merchants' credit cards.

12. Defendant MARCIA LYNN SANTIAGO and other co-conspirators posed as Victims and placed mail holds with the United States Postal Service on the Victims' mail intending to intercept the Victims' mail, including new credit cards obtained through instant credit applications, so as to both prevent the Victims from learning that loans and credit cards had been applied for and obtained in the Victims' names and also to use newly-obtained credit cards to purchase additional merchandise.

13. Defendant MARCIA LYNN SANTIAGO placed telephone calls to merchants while posing as Victims in order to facilitate the instant credit applications and purchase of merchandise using the Victims' identities and credit accounts.

### **OVERT ACTS**

In furtherance of the conspiracy, and to achieve its objects, defendant MARCIA LYNN SANTIAGO, and other co-conspirators known and unknown committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about August 18, 2018, at a Gap clothing store in Philadelphia, Pennsylvania, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including a fraudulent driver's license in the name of R.W. but containing defendant SANTIAGO's photograph, to access R.W.'s existing Gap credit card account ending in 4384, issued by Synchrony Bank, to purchase approximately \$483.30 worth of merchandise, all without Victim R.W.'s knowledge and consent.

2. On or about August 18, 2018, at a Home Depot store in Frazer, Pennsylvania, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim H.G., including a fraudulent driver's license in the name of H.G. but containing defendant SANTIAGO's photograph, to apply for a Home Depot credit card, issued by Citibank,

with a credit limit of approximately \$8,000, in the name of Victim H.G., all without Victim H.G.'s knowledge and consent.

3. On or about August 19, 2018, at a Gap clothing store in King of Prussia, Pennsylvania, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including a fraudulent driver's license in the name of R.W. but containing defendant SANTIAGO's photograph, to access R.W.'s existing Gap credit card account ending in 4384, issued by Synchrony Bank, to purchase approximately \$279.99 worth of merchandise, all without Victim R.W.'s knowledge and consent.

4. On or about August 19, 2018, at a Best Buy store in East Hanover, New Jersey, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including a fraudulent driver's license in the name of R.W. but containing defendant SANTIAGO's photograph, to apply for a Best Buy credit card, issued by Citibank, with a credit limit of approximately \$2,001, in the name of Victim R.W., all without Victim R.W.'s knowledge and consent.

5. On or about August 19, 2018, during a telephone call with a Best Buy customer service representative, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including R.W.'s name, date of birth, and social security number, to attempt without success to purchase merchandise from Best Buy to be charged to the recently-applied-for Best Buy credit card in the name of Victim R.W.

6. On or about August 21, 2018, at a TD Bank branch in East Windsor, New Jersey, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including Victim R.W.'s name, address, and date of birth, and posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name

but containing defendant SANTIAGO's photograph, and deposited \$30 cash into Victim R.W.'s TD Bank account ending in 5731, and thereby obtained Victim R.W.'s full TD Bank account number and knowledge of the date and location of the last deposit into the account, all without Victim R.W.'s knowledge and consent.

7. On or about August 21, 2018, at a TD Bank branch in Ewing, New Jersey, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including Victim R.W.'s name, address, and date of birth, and posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name but containing defendant SANTIAGO's photograph, and attempted without success to withdraw approximately \$8,000 from Victim R.W.'s TD Bank account ending in 5731, all without Victim R.W.'s knowledge and consent.

8. On or about August 21, 2018, a co-conspirator using the means of identification of victim R.W., including R.W.'s name, address, date of birth, and social security number, applied for a personal loan in the amount of approximately \$10,000 from Lender 1 by submitting an online application in the name of Victim R.W., all without Victim R.W.'s knowledge and consent.

9. On or about August 21, 2018, a co-conspirator using the means of identification of victim H.G., including H.G.'s name, address, date of birth, and social security number, applied for a personal loan in the amount of approximately \$10,000 from Lender 1 by submitting an online application in the name of Victim H.G., all without Victim H.G.'s knowledge and consent.

10. On or about August 21, 2018, at a Lowe's store in East Caln Township, Pennsylvania, defendant MARCIA LYNN SANTIAGO used the means of identification of

Victim H.G., including a fraudulent driver's license in the name of H.G. but containing defendant SANTIAGO's photograph, to apply for and obtain approval for a Lowe's credit card ending in 9229, with a credit limit of approximately \$8,000, issued by Synchrony Bank in the name of Victim H.G., all without Victim H.G.'s knowledge and consent.

11. On or about August 22, 2018, at the Lender 1 branch office located in East Norriton Township, Pennsylvania, co-conspirator Lashona Nicole Watkins, charged separately, posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name but containing Watkins' photograph, and a copy of Victim R.W.'s TD Bank statement, and attempted without success to obtain a check in the amount of approximately \$10,000 that Watkins expected to be issued based on a fraudulent loan application submitted by a co-conspirator using Victim R.W.'s means of identification, all without Victim R.W.'s knowledge and consent.

12. On or about October 18, 2018, at a Sears Hardware Store in Norristown, Pennsylvania, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim M.L., including a fraudulent driver's license in the name of M.L. but containing defendant SANTIAGO's photograph, to apply for and obtain a Sears MasterCard ending in 7258, with a credit limit of approximately \$8,000, issued by Citibank in the name of Victim M.L., and then utilized the credit card to purchase approximately \$5,935.97 worth of merchandise, all without Victim M.L.'s knowledge and consent.

13. On or about October 20, 2018, at a Lowe's store in Havertown, Pennsylvania, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim M.L., including a fraudulent driver's license in the name of M.L. but containing defendant SANTIAGO's photograph, to apply for and obtain a Lowes credit card ending in

6043, with a credit limit of approximately \$7,000, issued by Synchrony Bank in the name of M.L., all without Victim M.L.'s knowledge and consent.

14. On or about October 20, 2018, defendant MARCIA LYNN SANTIAGO entered a United States Post Office in Lansdale, Pennsylvania, and used the means of identification of Victim M.L., including a fraudulent driver's license in the name of M.L. but containing defendant SANTIAGO's photograph, to place a mail hold on Victim M.L.'s mail so that the mail, including newly-obtained credit cards would not be delivered to M.L.'s residence and would instead be held at the United States Post Office for pickup by defendant SANTIAGO, all without Victim M.L.'s knowledge and consent.

15. On or about October 21, 2018, at a Lowe's store in Mount Holly, New Jersey, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim M.L., including a fraudulent driver's license in the name of M.L. but containing defendant SANTIAGO's photograph, to access the newly-obtained credit account ending in 6043 to purchase approximately \$5,279 worth of merchandise, all without Victim M.L.'s knowledge or consent.

16. On or about October 21, 2018, at a U-Haul branch in Maple Shade, New Jersey, defendant MARCIA LYNN SANTIAGO posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim M.L.'s name but containing defendant SANTIAGO's photograph, and rented a U-Haul truck in Victim M.L.'s name.

17. On or about October 23, 2018, at the Nordstrom Rack store in Lawrence Township, New Jersey, defendant MARCIA LYNN SANTIAGO posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim M.L.'s name but containing defendant SANTIAGO'S photograph, to apply for a Nordstrom credit card with a



credit limit of approximately \$5,000, issued by TD Bank in the name of Victim M.L., all without Victim M.L.'s knowledge and consent.

18. On or about October 23, 2018, at a Raymour and Flanigan Furniture and Mattress Store in Lawrence Township, New Jersey, defendant MARCIA LYNN SANTIAGO posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim M.L.'s name but containing defendant SANTIAGO'S photograph, to apply for and obtain approval for a \$10,000 Raymour and Flanigan credit card ending in 9762, issued by TD Bank in the name of Victim M.L. and then utilized the credit card to order approximately \$9,596.20 in furniture to be delivered to an address in Trenton, New Jersey, all without Victim M.L.'s knowledge and consent.

19. On or about October 25, 2018, at the Lender 1 branch office located in Hatfield, Pennsylvania, defendant MARCIA LYNN SANTIAGO posed as Victim M.L. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim M.L.'s name but containing defendant SANTIAGO's photograph, and attempted without success to obtain a check in the amount of approximately \$10,000 that defendant SANTIAGO expected to be issued based on the fraudulent loan application submitted by a co-conspirator using Victim M.L.'s means of identification, all without Victim M.L.'s knowledge and consent.

20. On or about October 25, 2018, in Hatfield, Pennsylvania, a co-conspirator possessed two fraudulent Pennsylvania driver's licenses in the names of Victim A.A. and B.W.S., respectively, each containing defendant MARCIA LYNN SANTIAGO's photograph.

21. On or before October 29, 2018, defendant MARCIA LYNN SANTIAGO caused Citibank to send via United States Mail a Sears MasterCard ending in 7258 with a credit

limit of approximately \$8,000 to Victim M.L., which was delivered to and held for pickup at the United States Post Office in Lansdale, Pennsylvania.

22. On or before October 29, 2018, defendant MARCIA LYNN SANTIAGO caused Synchrony Bank to send via United States Mail a Lowes credit card ending in 6043 to Victim M.L., which was delivered to and held for pickup at the United States Post Office in Lansdale, Pennsylvania.

All in violation of Title 18, United States Code, Section 1349.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this information, Citibank issued and serviced Best Buy, Home Depot, and Sears credit cards and did business in interstate and foreign commerce.
2. At all times material to this information, Synchrony Bank issued and serviced Gap and Lowes credit cards and did business in interstate and foreign commerce.
3. At all times material to this information, TD Bank issued and serviced Nordstrom and Raymour and Flanigan credit cards and did business in interstate and foreign commerce
4. At all times material to this information, U-Haul operated vehicle rental locations from which persons could rent vans, trucks, and other vehicles, and did business in interstate and foreign commerce.
5. Beginning on or before May 24, 2018, and continuing until on or about October 25, 2018, in the Eastern District of Pennsylvania and elsewhere, defendant

**MARCIA LYNN SANTIAGO**

conspired and agreed with others known and unknown, to commit offenses against the United States, that is, to knowingly and with intent to defraud traffic in and use one or more unauthorized access devices during any one year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, in violation of Title 18, United States Code, Sections 1029(a)(2).

**MANNER AND MEANS**

6. Paragraphs 1, 3 through 6, and 10 through 13 of the “Manner and Means” section of Count One are incorporated here.

**OVERT ACTS**

1. In furtherance of the conspiracy, defendant MARCIA LYNN SANTIAGO and other co-conspirators known and unknown committed overt acts in in the Eastern District of Pennsylvania and elsewhere, including among others Overt Acts 1 through 5, 10, and 12 through 18, and 20 through 22 alleged in the “Overt Acts” section of Count One, which are incorporated here.

All in violation of Title 18, United States Code, Section 1029(b)(2).

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. At all times material to this Information, TD Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 18409.

2. From in or about June 2018 through in or about August 2018, in the District of New Jersey, and elsewhere, defendant

**MARCIA LYNN SANTIAGO**

knowingly executed, and aided and abetted the execution of, a scheme to defraud TD Bank and to obtain monies owned by and under the care, custody, and control of TD Bank by means of false and fraudulent pretenses, representations, and promises.

**THE SCHEME**

3. One or more co-schemers obtained means of identification of TD Bank customers (hereinafter the “Victims”) including their names, addresses, dates of birth, drivers’ license numbers, and social security numbers, without the Victims’ knowledge and consent.

4. One or more co-schemers recruited other co-schemers, including defendant MARCIA LYNN SANTIAGO, to participate in the scheme by posing as bank customers using false drivers’ licenses and the means of identification of legitimate bank customers, and withdraw money from legitimate bank customers’ accounts without their knowledge and consent.

5. One or more co-schemers manufactured false drivers’ licenses and other false documentation using the means of identification of the Victims and photographs of defendant MARCIA LYNN SANTIAGO and other co-schemers.

6. Defendant MARCIA LYNN SANTIAGO and other co-schemers entered bank branches and used the false drivers' licenses and other means of identification of the Victims to pose as the Victims and withdraw and attempt to withdraw funds from the Victims' bank accounts.

**ACCOUNT OF VICTIM R.W.**  
**(Intended Loss of \$8,000)**

7. On or about August 21, 2018, at a TD Bank branch located in East Windsor, New Jersey, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including Victim R.W.'s name, address, date of birth, and TD Bank checking account number ending in 5731, and posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name but containing defendant SANTIAGO's photograph, and deposited \$30 cash into Victim R.W.'s TD Bank account ending in 5731, all without Victim R.W.'s knowledge and consent.

8. On or about August 21 2018, at a TD Bank branch located in Ewing, New Jersey, defendant MARCIA LYNN SANTIAGO used the means of identification of Victim R.W., including Victim R.W.'s name, address, date of birth, and TD Bank account number, and posed as Victim R.W. by, among other things, presenting a fraudulent Pennsylvania drivers' license in Victim R.W.'s name but containing defendant SANTIAGO's photograph, and attempted without success to withdraw approximately \$8,000 cash from R.W.'s TD Bank account ending in 5731, all without Victim R.W.'s knowledge and consent.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about August 18, 2018, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MARCIA LYNN SANTIAGO**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, date of birth, address, and social security number of H.G., during and in relation to conspiracy to commit mail and wire fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of this Information.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**COUNT FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about August 21, 2018, in the District of New Jersey, and elsewhere,  
defendant

**MARCIA LYNN SANTIAGO**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, address, date of birth, social security number, and TD Bank account number of R.W., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344, as charged in Count Three of this Information.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.



**COUNT SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about October 18, 2018, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MARCIA LYNN SANTIAGO**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, date of birth, address, and social security number of M.L., during and in relation to conspiracy to commit mail and wire fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of this Information.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 1029, 1344, and 1349, set forth in this information, defendant

**MARCIA LYNN SANTIAGO**


shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations, including but not limited to \$1,500 in United States currency (money judgment).

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 981 and 982, and Title 28,  
United States Code, Section 2461(c).

  
**WILLIAM M. McSWAIN**  
**UNITED STATES ATTORNEY**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**MARCIA LYNN SANTIAGO**

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**INFORMATION**

**Counts**

18 U.S.C. § 1349 (conspiracy to commit mail and wire fraud – 1 count)  
18 U.S.C. § 1029(b)(2) (conspiracy to commit access device fraud – 1 count)  
    18 U.S.C. § 1344 (bank fraud – 1 count)  
18 U.S.C. § 1028A(a)(1) (aggravated identity theft – 3 counts)  
    18 U.S.C. § 2 (aiding and abetting)

**Notice of forfeiture**

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A true bill.

\_\_\_\_\_  
Foreman

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Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20\_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

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